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OCT 19 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

October 19, 1995

VIA HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W. - Room 222
Washington, D.C. 20554

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Re: PR Docket No. 92-257
RM-7956
RM-8031
RM-8352

Dear Mr. Caton:

On behalf of Ross Engineering, we are filing an original and seven (7) copies of its Reply Comments in the above-referenced matter.

If there are any questions, please communicate with the undersigned.

Respectfully submitted,

FLETCHER, HEALD & HILDRETH, P.L.C.

Leonard Robert Raish

Leonard Robert Raish
Counsel for Ross Engineering

LRR:cej
Enclosures

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BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

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OCT 19 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)	
)	PR Docket No. 92-257
Amendment of the Commission's)	RM-7956
Rules Concerning Maritime)	RM-8031
Communications)	RM-8352

To: The Commission

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REPLY COMMENTS BY ROSS ENGINEERING

Ross Engineering ("Ross"), by its attorney, hereby submits the Reply Comments below on comments received by the Commission on the Further Notice of Proposed Rulemaking ("Further Notice") in the above cited proceeding.

On reviewing the comments filed, Ross feels there is some agreement, a significant amount of "near agreement," and some disagreement among the commentors. The obvious easy answer would be for the FCC to simply adopt the Rules already agreed upon internationally. Failing this, the Commission could undertake a "Negotiated Rulemaking" to develop in final form the needed amendments to the Commission's Rules. It is suggested that the various maritime interests, sitting in conference, could readily agree among themselves on recommended final text the Commission could then use in its Rulemaking action.

If the Commission decides to proceed along the lines suggested above, the following broad principles are proposed for inclusion as general guidance:

- (1) There should be consistency between internationally agreed recommendations and actions taken within the U.S. Equipment

manufacturers can then produce standardized equipments for use on a worldwide basis at better prices.

- (2) The FCC should take into account and minimize the use of U.S. developed standards that may digress from standards already agreed upon by the U.S. at the ITU level. The FCC should review the later published proposed revisions of ITU Recommendations 493 and 541 with respect to new classes of equipment in light of the RTCM SC-101 class noted in Further Notice. We believe the SC-101 class should be replaced with class D for the VHF equipment and in an appropriate sub-class for HF. This would ensure the Coast Guard will be able to perform their services under GMDSS and would preclude the proliferation of false distress alerts which currently is threatening to undermine GMDSS.
- (3) Proceed and assure implementation of the GMDSS by insuring watches are maintained by coast stations and as much automation as practicable is used. Part 80 Subpart W should be re-enforced to permit automation, e.g., since GMDSS requirements apply to public coast stations, then it would follow that the DSC implementation mandated by the GMDSS per Subpart W would provide for automation in accordance with the applicable ITU

Recommendation 493 and 541. (ITU-R 8B Documents 8/19E and 8/26E) This would give the coast station operators the incentive to gain from their GMDSS implementation.

Respectfully submitted,

ROSS ENGINEERING

By: Leonard Robert Raish
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Its Attorney

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October 19, 1995

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